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JUN 21 2001

MARY E. D'ANDREA, CLERK
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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

KEITH CROSBY, :
Petitioner : Civil No. 1:CV-00-2211
v. : (Judge Kane)
MICHAEL ZENK, :
Respondent :

MOTION FOR ENLARGEMENT OF TIME

Pursuant to Fed. R. Civ. P. 6(b), respondent requests this Court to grant him a 20-day enlargement of time in which to file his response to the Court's show cause order. Respondent states the following in support thereof:

1. Petitioner, Keith Crosby, is an inmate incarcerated at the Allenwood Federal Correctional Institution in White Deer, Pennsylvania.

2. Crosby filed the instant petition pursuant to 28 U.S.C. § 2241. The Petition for Writ of Habeas Corpus raises a claim against the United States Parole Commission ("Commission").

3. By Order dated June 4, 2001, respondent was ordered to show cause on or before June 25, 2001, why Crosby should not be granted habeas corpus relief.

4. On February 2, 1993, Crosby was paroled from a 25-year federal sentence for bank robbery and use of a firearm during a crime of violence. He was to remain under parole supervision until December 2, 2010.

5. By notice of action dated December 13, 1993, the Commission ordered that Crosby's parole be revoked and that he serve 120 months prior to reparole. Crosby currently has a presumptive parole date of September 1, 2003.

6. Crosby's petition raises claims regarding his December 5, 1993, parole revocation hearing.

7. Crosby's claims are appropriately addressed by the Commission. Accordingly, in order to properly respond to Crosby's allegations, the United States Attorney's Office has requested assistance from legal counsel at the Commission.

8. The Commission's legal counsel has informed undersigned counsel that, due to her schedule and a heavy backlog of cases at the Commission, she is unable to provide a report to undersigned counsel before July 12, 2001.

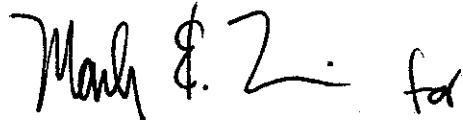
9. Thus, on behalf of Respondent, the United States Attorney's Office requests an enlargement of time of 20 days in which to respond to the show cause order.

10. Crosby will not be unduly prejudiced by the requested enlargement of time as he already had judicial review of the claims raised in the instant petition in February, 1999. See Crosby's memorandum, p.10.

WHEREFORE, on behalf of respondent, the United States Attorney's Office requests a 20-day enlargement of time until July 16, 2001, in which to adequately respond to the allegations of the petition. Counsel certifies that he has not sought Crosby's concurrence because Crosby is a prisoner proceeding pro se. M.D. Pa. Local Rule 7.1.

Respectfully submitted,

MARTIN C. CARLSON
United States Attorney

A handwritten signature in dark ink, appearing to read "Mark E. Z." followed by a flourish and the word "for".

MATTHEW E. HAGGERTY
Assistant U.S. Attorney
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228 Walnut Street
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Date: June 21, 2001

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CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.


That on June 21, 2001, she served a copy of the attached

MOTION FOR ENLARGEMENT OF TIME

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

Addressee:

Keith Crosby
Reg. No. 29802-066
FCI Allenwood
P.O. Box 2000
White Deer, PA 17887


ANITA L. LIGHTNER
Paralegal Specialist